

1 **Goldsmith & Guymon, P.C.**
2 Marjorie A. Guymon, Esq.
3 Nevada Bar No. 4983
4 mguymon@goldguylaw.com
5 2055 Village Center Circle
6 Las Vegas, Nevada 89134
7 Telephone: (702) 873-9500
8 Facsimile: (702) 873-9600
9 Attorneys for Trangistics, Inc.

10
11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re:) Case No. BK-S-23-10423-MKN
14 CASH CLOUD INC.,) Chapter 11
15 Debtor.) Hearing Date: July 12, 2023
16) Hearing Time: 10:30 a.m.

17 **MOTION FOR APPROVAL OF ADMINISTRATIVE CLAIM**

18 TRANGISTICS, INC. ("Trangistics"), by and through counsel, GOLDSMITH & GUYMON,
19 P.C., hereby requests approval of its Administrative Claim, copy attached as Exhibit A, as follows:

20 **I.**

21 **JURISDICTION**

22 This Court has jurisdiction pursuant to 28 U.S.C. §1334 and 28 U.S.C. §147(b)(2).
23 Furthermore, venue is proper under 28 U.S.C. §§1408 AND 1409.

24 **I.**

25 **STATEMENT OF FACTS**

26 Trangistics provided warehouse storage services for CASH CLOUD INC. ("Debtor") at all
27 times relevant during these bankruptcy court proceedings. All relevant documentation is attached
28 to Exhibit A, the Administrative Claim filed with this Court.

Pursuant to Exhibit A, Trangistics is owed \$154,400 for the period of February 7, 2023
through May 6, 2023, and \$38,600 for each month thereafter.

Trangistics is in possession of assets belonging to the Debtor in its warehouse.

II.

STATEMENT OF LAW/ARGUMENT

11 U.S.C. §503(a) provides:

(a)An entity may timely file a request for payment of an administrative expense, or may tardily file such request if permitted by the court for cause.

Additionally, 11 U.S.C. §503(b) provides that:

After notice and a hearing, there shall be allowed administrative expenses... including—

(1)(A)the actual, necessary costs and expenses of preserving the estate....

Because Trangistics is in possession of assets of the bankruptcy estate and has continued to provide warehousing of these assets through the course of these proceedings upon the original terms and conditions of the Parties' agreement, it should be compensated pursuant to the terms of said agreement as set forth herein, to be calculated per diem until payment is made and the assets are removed from the warehouse.

WHEREFORE, Trangistics respectfully requests this Court approve the Administrative Claim filed in the amount of \$154,400, plus per diem charges calculated based upon the \$38,600 per month fee, until Debtor's assets are removed, plus any further relief this Court deems just and proper.

DATED: June 9, 2023.

GOLDSMITH & GUYMON, P.C.

By: /s/ Marjorie A. Guymon, Esq.
Marjorie A. Guymon, Esq.
Nevada Bar No. 4983
mguymon@goldguylaw.com
2055 Village Center Circle
Las Vegas, Nevada 89134
Telephone: (702) 873-9500
Attorneys for Trangistics, Inc.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT District of Nevada		Proof of Non-Professional Administrative Expense	
Name of Debtor(s): Cash Cloud, Inc.		Case Number: 23-104273-mkn	
Name of Claimant: Trangistics, Inc. Name and address where notices should be sent: Marjorie A. Guymon Goldsmith & Guymon, P.C 2055 Village Center Circle Las Vegas, NV 89134 Telephone Number: (702) 873-9500		<input type="checkbox"/> Check this box to indicate that this proof of expense amends a previously filed proof of expense. Filed on: _____ <input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of expense relating to the claimed expense. Attach a statement giving particulars.	
1. Amount of Administrative Expense Claimed: \$ 154,400 for period 2/7/2023 – 5/6/2023 (\$38,600 per month)			
<input type="checkbox"/> Check this box if expense claimed includes interest or other charges in addition to the principal amount of the expense. Attach itemized statement of interest or charges.			
2. Basis for Expense Claimed <input checked="" type="checkbox"/> Actual and necessary costs of preserving the estate (11 U.S.C. § 503(b)(1)(A)) <input type="checkbox"/> Taxes (11 U.S.C. § 503(b)(1)(B)) <input type="checkbox"/> Non-professional actual and necessary expenses incurred by creditor (11 U.S.C. § 503(b)(3)) <input type="checkbox"/> Compensation for services rendered by an indenture trustee (11 U.S.C. § 503(b)(5)) <input type="checkbox"/> Fees and mileage per Chapter 119 of Title 28, U.S. Code (11 U.S.C. § 503(b)(6)) <input type="checkbox"/> Claim for rejection of non-residential real property lease following assumption under 11 U.S.C. 365 (11 U.S.C. § 503(b)(7)) <input type="checkbox"/> Actual and necessary costs and expenses of closing a health care business (11 U.S.C. § 503(b)(8)) <input type="checkbox"/> Goods provided to debtor within 20 days before the commencement of the case (11 U.S.C. § 503(b)(9))			
3. Date(s) Expense Incurred: beginning 2/7/2023 and continuing			
4. Last 4 digits of any number by which claimant identifies debtor: EIN XX-XXX4109			
5. Credits: The amount of all payments made on this claimed expense has been credited for the purpose of making this proof of expense.			
6. Documents: Attach redacted copies of any documents that support the expense claimed, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, and judgments. You may also attach a summary. (See instruction 6 and definition of "redacted.") Do not send original documents. If the documents are not available, please explain:		THIS SPACE IS FOR COURT USE ONLY	
Sign and print the name and title, if any, <u>Joey Hougham</u> Date: 6/2/2023 Signature: /s/ Joey Hougham Printed name/title: President Address if applicable: PO Box 1750 Sisters, OR 97759			
Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both – 18 U.S.C. §§ 152 and 3571.			



Sales Rep: _____

CREDIT INFORMATION SHEET

Legal Business Name Cash Cloud Inc **Trade Name/DBA** Coin Cloud

Street Address 9580 W Sahara Ave Suite 200 **City** Las Vegas **State** NV **Zip** 89117

Billing Address (if different) _____ **City** _____ **State** _____ **Zip** _____

Primary Contact London Molina **Tel#** (702) - 727 - 9356 **E-mail** london.molina@coin.cloud

Date Business Started/Acquired 2014 **Bank Name & Tel#** Surety Bank (386) - 734 - 1647

A/P Contact Amy McCray **Tel#** (253) - 273 - 0495 **Fax #** () - -

Billing Instructions Please email an invoice copy

Billing Email: ap@coin.cloud

Amount of Credit Requested \$ 25,000 **Highest Vendor Credit Limit \$** 50,000

Federal ID # 7468 **MC #** _____ **Duns #** 1323

Business Trade References

Company Name	Annual \$ Volume	City and State	Phone Number
Cole Kepro		North Las Vegas, NV	702-633-4270
The Jimmerson Law Firm		Las Vegas, NV	702-388-7171
Bancsource		Springfield, MO	417-732-7238

Trangistics, Inc. – Credit Policy

We authorize Trangistics to make any inquires required to determine credit worthiness. Payments for freight invoices are to be received at Remittance Address WITHIN 15 DAYS OF INVOICE DATE. Accounts 16 days or older will be considered delinquent and subject to review of credit privileges and possible collection action. If collection is made by suit or otherwise, the undersigned Company agrees to pay all collection costs including reasonable attorneys' fees and hereby waive all rights to claim exemption under state laws. Trangistics does not provide original paperwork (bol's, delivery receipts etc.) with invoicing; however, scanned copies may be provided upon request. If the Undersigned Company requires that a special reference number be listed on invoices, please refer to the above section titled Billing Instructions. The undersigned Company agrees that it will not deduct or offset from any invoice payments, regardless of potential exempt status for claims, and agrees that payment obligations to Trangistics shall not be subject to receipt of payment from any other party. All claims must be handled separately from invoice payments and be filed in writing with Trangistics within nine (9) months from the date of load pickup. It is understood and agreed that Trangistics is a property broker and not a carrier. Shipper will not insert, nor authorize a carrier to insert Trangistics' name on a bill of lading as the carrier. Shipper agrees that any insertion of Trangistics' name as the carrier on a bill of lading shall be for the Shipper's convenience only and shall not change Trangistics' status as a property broker. The terms of this Credit Policy supersede any other contract or agreement describing payment terms or claims handling with Trangistics. This Agreement shall be interpreted, construed and enforced in accordance with and governed by the laws of the State of Oregon without giving effect to any conflict of law provisions. Any litigation between Applicant and Trangistics shall take place in the state and federal courts situated in Oregon. Trangistics reserves the right to terminate this agreement at anytime. Trangistics reserves the right to modify credit policies. The undersigned Company has read the above Credit Policy and agrees to abide by its terms and conditions and guarantees accuracy of the above information.

X Coin Cloud
(Company Name)

6/21/21
(Date)

855-264-2046
(Phone Number)

X Jeffrey L. Garon
(Authorized Signature – A/P Manager, Controller or CFO)

Jeffrey Garon CFO/COO
(Name) (Title)

Fax Completed Application to: Credit Department, Fax # 503-336-9311

REMITTANCE ADDRESS: TRANGISTICS, INC. PO BOX 1750, Sisters, OR 97759

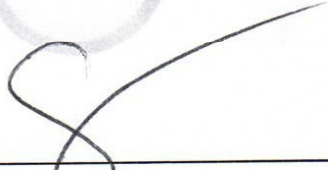
OVERNIGHT: Trangistics, 69725 Goodrich Rd., Sisters OR 97759

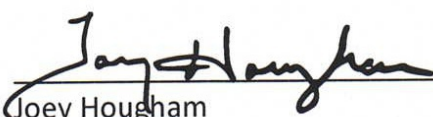
WIRE: Trangistics, Inc. / US Bank, 272 E. Main Ave, Sisters OR 97759, Acct# * call for number ***, ABA 123000220**

Type: Money received & Delivery method: Any					[by CF]	[by CF]
Date	Type	No.	Total	Attachmt	mo./yr.	\$/month
12/21/2022	Payment	586/1	30,000.00		Dec-22	\$60,450.00
12/02/2022	Payment	565/12	30,450.00			
11/18/2022	Payment	47549	4,332.00		Nov-22	\$15,385.00
11/04/2022	Payment	543/22	11,053.00			
08/17/2022	Payment		43,000.00		Aug-22	\$47,200.00
08/01/2022	Payment	52802	4,200.00			
07/22/2022	Payment	448/5	32,350.00		Jul-22	\$118,978.00
07/15/2022	Payment	444/8	76,446.00			
07/01/2022	Payment	438/53	10,182.00			
06/17/2022	Payment	432/6	3,850.00		Jun-22	\$47,475.00
06/10/2022	Payment		2,500.00			
06/02/2022	Payment		41,125.00			
05/23/2022	Payment		35,000.00		May-22	\$38,766.00
05/12/2022	Payment		3,766.00			
04/29/2022	Payment		1,925.00		Apr-22	\$38,384.00
04/21/2022	Payment		7,602.00			
04/14/2022	Payment		1,164.00			
04/08/2022	Payment		7,250.00			
04/01/2022	Payment		20,443.00			
03/25/2022	Payment	383/6	799.00		Mar-22	\$22,105.00
03/21/2022	Payment	380/3	4,456.00			
03/07/2022	Payment	367/22	16,850.00			
02/24/2022	Payment	362/11	18,315.00		Feb-22	\$57,383.00
02/18/2022	Payment		3,900.00			
02/03/2022	Payment	346/6	35,168.00			
01/27/2022	Payment	341/18	8,875.00		Jan-22	\$13,567.98
01/14/2022	Payment		2,047.98			
01/06/2022	Payment		2,645.00			
12/23/2021	Payment	9672	15,400.00		Dec-21	\$36,275.00
12/15/2021	Payment	9672	4,400.00			
12/10/2021	Payment		3,335.00			
12/02/2021	Payment		13,140.00			
11/18/2021	Payment		17,535.00		Nov-21	\$42,495.00
11/05/2021	Payment		24,960.00			
10/29/2021	Payment		490.00		Oct-21	\$18,814.00
10/20/2021	Payment		8,600.00			
10/15/2021	Payment		9,724.00			
09/30/2021	Payment		1,250.00		Sep-21	\$40,150.00
09/23/2021	Payment	9672	18,500.00			
09/17/2021	Payment	9672	14,800.00			
09/10/2021	Payment	9672	5,600.00			
07/02/2021	Payment	9672	4,800.00		Jul-21	4,800.00
			602228		avg/mo 17 months	\$35,425.18

Powerhouse + Trangistics Term Sheet**Dates:** Feb 22, 2022 - TBD**Storage Space:** 14,000 SF**Rate:** \$2.00/SF per month (\$28,000 total)**Transit NLV to PH:** \$525**Transit PH to LV:** \$400**Unload/Reload:** \$200 per load**Notes:**

- Warehouse/Labor/Trucking all invoiced separately
- All invoices will be factored by Triumph Business Capital
- 1st month warehouse invoice includes prorated February and March fees.



Christopher Adamson
Powerhouse

Joey Hougham
Trangistics**Contacts:**

Christopher Adamson
Managing Partner
954-707-3780

Arthur Jackson
Managing Partner
561-718-2388

 702-707-3812 info@powerhouselv.com www.powerhouselv.com 13850 S. Decatur Blvd.
Las Vegas NV 89140/89054



Joey Hougham <joey@trangistics.com>

Fwd: Las Vegas Temp Storage agreement

1 message

Dave McGrew <dave@trangistics.com>
To: Joey Hougham <joey@trangistics.com>

Wed, Jan 18, 2023 at 7:08 AM

Main email string...

Dave McGrew

D: 541.527.1192
O: 541.923.6309
M: 541.408.5567
dave@trangistics.com
www.trangistics.com

Begin forwarded message:

From: London Molina <london.molina@coin.cloud>
Subject: Re: Las Vegas Temp Storage agreement
Date: February 22, 2022 at 10:15:15 AM MST
To: Dave McGrew <dave@trangistics.com>, James Bauer <james.bauer@coin.cloud>

Jim,

Let us know if the email suffices, or if you need something else for Jeff/Chris.

On Tue, Feb 22, 2022 at 8:57 AM London Molina <london.molina@coin.cloud> wrote:
Update:

Ken at DLI is indeed taking the 330 units starting today.

On Tue, Feb 22, 2022 at 8:17 AM London Molina <london.molina@coin.cloud> wrote:Dave,
All looks good. Reduced cost from 109K to 95K for launch of movement of 914 units this week. Launch storage costs for the first 2 months noted, the 14K sqf we will be using all of it. Last on at 32K there after for months, 3,4,5, etc. As discussed, we are moving all 112 PR to HQ all day today Tuesday as LTL. Let's start moving the 914 to Sloan at 8am tomorrow morning Wednesday as FTL (51 per) . I need time to prep the 914 anyway.Jim,
The reduced cost came about through my last minute Friday evening conversation with Ken at DLI. He stated he could take the 330. IF for some reason he can't or can't in a timely manner, we will have the room (14k sqf) at the Sloan Warehouse and the price would jump back up a little to get 330 over to Sloan.On Mon, Feb 21, 2022 at 11:51 AM Dave McGrew <dave@trangistics.com> wrote:
London,

Let me know if this is acceptable: based on transporting 914 machines (18 loads)

Storage Space is \$2.35 per Sqft per month for 14,000 sqft (\$32,900) for additional months. The rate will be prorated for any partial months. In February

Total project includes:

- 2 months warehouse
- Transit between current warehouse and storage of 914 machines
- Transit from storage to designated warehouse of 914 machines (additional trips will be added if necessary)
- Load and reload at Storage

Total estimated cost for initial 8 weeks: \$95,850

Dave McGrew



D: 541.527.1192

O: 541.923.6309

M: 541.408.5567

dave@trangistics.com

www.trangistics.com

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2 attachments



PastedGraphic-5.tiff

6K



PastedGraphic-5.tiff

6K



Joey Hougham <joey@trangistics.com>

Fwd: Temp Storage

1 message

Dave McGrew <dave@trangistics.com>
To: Joey Hougham <joey@trangistics.com>

Wed, Jan 18, 2023 at 7:07 AM

Dave McGrew

D: 541.527.1192
O: 541.923.6309
M: 541.408.5567
dave@trangistics.com
www.trangistics.com

Begin forwarded message:

From: London Molina <london.molina@coin.cloud>
Subject: Temp Storage
Date: February 18, 2022 at 5:22:31 PM MST
To: Dave McGrew <dave@trangistics.com>, James Bauer <james.bauer@coin.cloud>

Dave,

Here are the adjusted launch numbers for storage.

Let's keep the storage capacity at the 1356 count as discussed. Meaning, as I get more machines from the factory, I'll need to turn and burn them asap. I foresee us needing even more space than 1356 if they have it. So go ahead and send over the necessary paperwork and price. Should be for 18 FTL's instead of 27 and temp storage for a min of 1356 for up to 5 months.

112 to HQ - Rae will work with Arlette
330 to DLI Multi Locations - Rae will work with Arlette551 to Temp Storage
144 to Temp Storage
219 to Temp Storage

914 to Temp Storage ImmediatelyJim,
Good news. I talked to Ken.....he said he could take 330 units. He will have a list to me next week.

--

London R. Molina
Production & Logistics Manager
Factory Production/Transportation/Purchasing
702-727-9356
london.molina@coin.cloud

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Joey Hougham <joey@trangistics.com>

Re: Moving to new warehouse TBD

1 message

Dave McGrew <dave@trangistics.com>
To: Joey Hougham <joey@trangistics.com>

Wed, Jan 18, 2023 at 6:54 AM

Correction, them moving out potential
Dave McGrew



D: 541.527.1192
O: 541.923.6309
M: 541.408.5567
dave@trangistics.com
www.trangistics.com

On Jan 18, 2023, at 7:53 AM, Dave McGrew <dave@trangistics.com> wrote:

String prior to US providing the new warehouse....when theirs fell apart
Dave McGrew
<PastedGraphic-5.tiff>

D: 541.527.1192
O: 541.923.6309
M: 541.408.5567
dave@trangistics.com
www.trangistics.com

Begin forwarded message:

From: London Molina <london.molina@coin.cloud>
Subject: Re: Moving to new warehouse TBD
Date: December 8, 2022 at 5:13:19 PM MST
To: Dave McGrew <dave@trangistics.com>
Cc: Arlette Warner <arlette.warner@trangistics.com>, RaeAnna Burd <raeanna.mercado@coin.cloud>, Aaron Cutler <aaron.cutler@coin.cloud>

If it's okay with Sloan our guys would do the loading preferably because we have a certain serialization we have to keep and adhere to.

On Thu, Dec 8, 2022, 2:35 PM Dave McGrew <dave@trangistics.com> wrote:
I believe it is 450 for the warehouse to load as well?

Dave McGrew
Trangistics
541.408.5567
dave@trangistics.com
www.trangistics.com

On Thu, Dec 8, 2022, 3:28 PM Arlette Warner <arlette.warner@trangistics.com> wrote:
I have a rate of \$600.00 per truck load.

Arlette Warner
Dispatcher



PO Box 1750

Sisters, OR 97759
www.trangistics.com
Mobile- 541-480-5721
office-541-923-6309

On Thu, Dec 8, 2022 at 1:47 PM Arlette Warner <arlette.warner@trangistics.com> wrote:
I have a local carrier that can do these, do you have any idea of a start date, he is asking before he gets me a price.

Arlette Warner
Dispatcher



PO Box 1750
Sisters, OR 97759
www.trangistics.com
Mobile- 541-480-5721
office-541-923-6309

On Thu, Dec 8, 2022 at 1:12 PM London Molina <london.molina@coin.cloud> wrote:
Use zip 89115 as the destination.

[5035 Geist Ave](#)
[Las Vegas, NV 89115](#)

On Thu, Dec 8, 2022 at 12:07 PM Arlette Warner <arlette.warner@trangistics.com> wrote:
Got it, thank you.

Arlette Warner
Dispatcher



PO Box 1750
Sisters, OR 97759
www.trangistics.com
Mobile- 541-480-5721
office-541-923-6309

On Thu, Dec 8, 2022 at 12:05 PM London Molina <london.molina@coin.cloud> wrote:
No, these are all at Sloan. They have docks. Our new warehouse would have dock/docks as well.

So dock to dock.

867 Total Pallets @ 51 per truck = 17 FTL's from dock to dock.

On Thu, Dec 8, 2022 at 12:02 PM Arlette Warner <arlette.warner@trangistics.com> wrote:

Are we talking Boxtruck with Lift Gate required?

Arlette Warner
Dispatcher



PO Box 1750
Sisters, OR 97759
www.trangistics.com
Mobile- 541-480-5721
office-541-923-6309

On Thu, Dec 8, 2022 at 11:12 AM London Molina <london.molina@coin.cloud> wrote:
Same carrier over and overover several days is fine.

On Thu, Dec 8, 2022 at 10:56 AM Arlette Warner <arlette.warner@trangistics.com> wrote:

I'll can have some numbers to you shortly, will this be several loads a day, meaning can we use the same carrier over a few days or we need several for a same day move?

Arlette Warner
Dispatcher



PO Box 1750
Sisters, OR 97759
www.trangistics.com
Mobile- 541-480-5721
office-[541-923-6309](tel:541-923-6309)

On Thu, Dec 8, 2022 at 10:51 AM London Molina <london.molina@coin.cloud> wrote:

Hey Dave,

We will need to move approx 900 pallets out of Sloan to an undetermined new location in vegas. Approx 18 FTL trucks from point A to B. I need an estimate of the per cost truck load. A general idea, \$500, \$750, \$1000 per. You can use zip 89030 as an estimate. .

I need this info by tomorrow at 12pm noon my time.

--

London R. Molina
Sr Manager Operations
Factory Production -
Transportation -
Purchasing -
HQ-Warehousing & Refurbishment -
HQ-Spares -
HQ-DCM Field Technicians -

702-727-9356
london.molina@coin.cloud

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